

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

Hazardous Waste Program

March 13, 2002

Mr. Larry Baker
G&K Services
5995 Opus Parkway
Minnetonka, MN 55343-9078

Certified Mail # 24551160
RETURN RECEIPT REQUESTED

RE: Supplemental Investigation and Monitoring Plan
G&K Services
999 Vallejo Street, Denver, CO
COD983789447

Dear Mr. Baker:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Department) has reviewed the *Supplemental Investigation and Monitoring Plan* (the Plan), dated February 5, 2002 for the above-referenced G&K Services facility. The Department has the following comments regarding the Plan:

The Plan discusses the presence of TCE in the onsite groundwater as an indication that there is an offsite source, stating that TCE was never used at the site. TCE is a common breakdown product of PCE, and its presence does not necessarily indicate an offsite source. However, the presence of additional breakdown products, such as 1,2-DCE and vinyl chloride, in upgradient wells MW-B and MW-C does suggest that contamination in the vicinity of these wells is from an offsite source. A comparison of the relative percentages of PCE, TCE, 1,2-DCE and vinyl chloride, further suggests that contamination present in the vicinity of upgradient wells MW-B and MW-C is from a different source than contamination in the vicinity of well MW-2. A similar comparison of contaminant ratios was conducted by Camp Dresser & McKee (CDM) in 1994. At that time, the relative percentage difference between contaminants in well MW-2 and upgradient wells was not as pronounced. This suggests that the wells on the upgradient side of the G&K property are located near the downgradient edge of a degrading PCE plume, whereas well MW-2 is located in a source area. This theory is easily supported by the history of known sources in the area.

Given the conceptual source model discussed above, it is the Department's preference that investigation efforts be focused on delineating the extent of contamination downgradient of the known source area in the vicinity of well MW-2, rather than further delineation on the upgradient side of the property to prove the existence of an offsite source. The Department encourages G&K to proceed with the investigation on the upgradient side of the property. However, an investigation of the area downgradient of well MW-2 should also be conducted.

The Department understands that G&K prefers to proceed in a phased manner, delineating onsite groundwater contamination prior to proceeding with delineation of downgradient impacts. Therefore, the Department

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approves the Plan as submitted, and requests that a report documenting the results of the investigation be provided to the Department for review within sixty (60) days after receipt of analytical results. This report should also include a plan for delineating contamination downgradient of MW-2.

If you have any questions or would like to discuss this letter, please contact me at (303) 692-3357.

Sincerely,

A handwritten signature in cursive script, reading "Colleen Brisnehan".

Colleen Brisnehan
Hazardous Waste Corrective Action Unit
Compliance Program

cc: David Kreutzer - Colorado AGO
John Novick - Denver Department of Environmental Health
Robin Coursen - USEPA Region 8
Dana Wagner - Liesch Associates, Inc.